

**AGENDA ITEM 3b
SPECIAL UPDATE ON HIPAA AUDIT RESOLUTION STATUS
AS OF SEPTEMBER 30, 2010**

Audit (Report Issue Date): HIPAA Security Compliance Review (10/20/06)

Division responsible: Information Security Office

Finding 1.2 Description:

CalPERS implements security measures to protect information assets housed at CalPERS. Information Security Office should implement required specifications and assess whether each addressable specification is a reasonable safeguard in the environment.

Current Status:

IN PROGRESS. The resolution of this finding relies on the closure of all other HIPAA Security findings. Target Completion Date: December 31, 2011.

Finding 1.4 Description:

CalPERS' Event Logs Practice requires specific security events be logged at key servers. However, the practice does not specify which events must be logged at the system. Information Security Office should develop an Information System Activities Review Practice.

Current Status:

IN PROGRESS. Since PSR will be replacing all but one of the ePHI electronic record sets, the Information Security Office has been engaged with PSR and has assisted in clearly defining HIPAA logging criteria for ePHI electronic record sets. Target Completion Date: December 31, 2011.

Finding 6 Description:

CalPERS' Information Security Incidents Practice defines the events considered to be reportable incidents, however, current security practice and procedures do not adequately specify response efforts. Information Security Office should amend current security practices.

Current Status:

IN PROGRESS. The Information Security Office's Incident Management Team is addressing this issue as part of the 100 Day Plan for revamping the Incident Management Process/Procedures. Target Completion Date: December 31, 2010.

Finding 15.1 Description:

CalPERS' Event Logs Practice does not require a retention period of 6 years or recording of functions performed. Information Security Office should modify the Event Logs Practice to require the recording and retention requirements.

Current Status:

IN PROGRESS. Since PSR will be replacing all but one of the ePHI electronic record sets, the Information Security Office has been engaged with PSR and has assisted in clearly defining HIPAA logging criteria for ePHI electronic record sets including the six year retention requirement. Target Completion Date: December 31, 2011.

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Finding 15.2 Description:

The Document Management System does not log who viewed imaged documents nor when and where the imaged documents are created, printed, exported, or viewed. The Event Logs Practice should be modified to provide clearer guidelines.

Current Status:

IN PROGRESS. Since PSR will be replacing all but one of the ePHI electronic record sets, the Information Security Office has been engaged with PSR and has assisted in clearly defining HIPAA logging criteria for ePHI electronic record sets. Target Completion Date: December 31, 2011.